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Attorneys for Plaintiffs CANNON HUGH DANIELS,
ARIELE ROSTAMO aka ARIELE NELSON, SUSAN
ADELL DANIELS, and JOSEPH ALBERT DANIELS, IV

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CANNON HUGH DANIELS, deceased;
decedent's wife, ARIELE ROSTAMO aka
ARIELE NELSON; decedent's mother,
SUSAN ADELL DANIELS; and decedent's
father, JOSEPH ALBERT DANIELS, IV,
individually,

Case No.: 2:21-cv-0277 JAM-JDP

STIPULATION AND ORDER

Plaintiff,

vs.

CALIFORNIA FORENSIC MEDICAL
GROUP, INC., WELLPATH
MANAGEMENT, INC., BUTTE COUNTY,
S. Parker, D. Brownfield, Sergeant Turner,
Sergeant Behlke, Deputy Darnell, Deputy
Smith, Deputy Yee, Deputy Bazan, Deputy
Thornton, Sergeant Mell, Deputy Lazurenko,
Deputy LaRue, Deputy Ogden, Deputy
Mayfield, Deputy Davis, Deputy Tauscher and
Lt. Jarrod Agurkis, SACRAMENTO
COUNTY, Officer McKersie, Sergeant Bunn,
Sergeant Jenkins, Officer Rickett, Lieutenant
Hodgkins, Officer Gailey, Officer Tallman,
Officer Pomosson, and Officer Folena
Defendants. /

Complaint Filed: 02/11/2021

Pursuant to the minute order entered by the Court on July 26, 2024, the parties hereby submit this JOINT STIPULATION AND [PROPOSED ORDER] to set forth a discovery schedule concerning plaintiffs' expert replacement.

IT IS HEREBY STIPULATED by and between the parties through their counsel of record:

1. Plaintiff has identified Marc Eckstein, MD as the expert replacing Dr. Sperry and have produced Dr. Eckstein's report to defendants.
2. Defendants shall have until the end of September 13, 2024, to depose Dr. Eckstein;
3. Defendants' experts shall have three weeks after the deposition of Dr. Eckstein to provide any revised expert reports or rebuttal reports;
4. Plaintiffs shall have three weeks after the provision of Defendants' revised expert reports to depose any such defendants' experts only with regard to any revised opinions;
5. In order to accommodate potential calendar conflicts, the parties may mutually agree in writing (email shall be sufficient) to adjust the deadlines set forth above so long as all such expert discovery is completed no later than October 31, 2024.

IT IS SO STIPULATED.

Date: August 1, 2024

GORDON REES SCULLY MANSUKHANI

By /s/ Kendra N. Stark

Kendra N. Stark

Attorneys for Defendants California Forensics
Medical Group Incorporated and Wellpath
Management, Inc.

Date: August 1, 2024

ANDREW E. BAKOS & ASSOCIATES, P.C.

By /s/ Andrew Bakos

Andrew Bakos

Attorney for Plaintiffs

Date: August 1, 2024

D.B. HILL, A PROFESSIONAL LAW CORPORATION

By /s/ Dennis B. Hill
Dennis B. Hill
Attorney for Plaintiffs

ORDER

1. Defendants shall have until the end of September 13, 2024, to depose Dr. Marc Eckstein;
2. Defendants' experts shall have three weeks after the deposition of Dr. Eckstein to provide any revised expert reports or rebuttal reports;
3. Plaintiffs shall have three weeks after the provision of Defendants' revised expert reports to depose any such Defendants' experts only with regard to any revised opinions;
4. In order to accommodate potential calendar conflicts, the parties may mutually agree in writing (email sufficient) to adjust the deadlines set forth above so long as all such expert discovery is completed no later than **October 31, 2024**.

IT IS SO ORDERED.

Dated: August 09, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE